

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DEWEY R. BOZELLA,

Plaintiff,

v.

THE COUNTY OF DUTCHESS

Defendant.

)
)
)
)
)
) **No. 10 Civ. 4917 (CS)**
)
)
)
)
)
)
)
)
)

**PLAINTIFF DEWEY R. BOZELLA'S NOTICE OF MOTION IN LIMINE TO
PRECLUDE DUTCHESS COUNTY FROM REFERENCING AT TRIAL THE IMPACT
OF ANY JUDGMENT ON TAXPAYERS AND THE COUNTY'S ABILITY (OR
INABILITY) TO PAY ANY JUDGMENT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiff Dewey R. Bozella's Motion in Limine to Preclude Dutchess County from Referencing at Trial the Impact of Any Judgment on Taxpayers and the County's Ability (or Inability) to Pay Any Judgment, and the Omnibus Declaration of Ross Firsenbaum, dated December 10, 2014, and exhibits thereto, at a time and location to be determined, Plaintiff Dewey R. Bozella will move this Court for an order granting his motion and providing the relief requested therein.

Pursuant to this Court's Order dated September 23, 2014, Dutchess County's opposition to the motion (if any) is due on December 17, 2014.

Dated: New York, New York
December 10, 2014

Respectfully submitted,

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

By: /s/ Peter J. Macdonald

Peter J. Macdonald
Ross E. Firsenbaum
Shauna K. Friedman
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel.: (212) 230-8800
Fax: (212) 230-8888

Attorneys for Plaintiff Dewey R. Bozella